IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF NORTH CAROLIN

UNITED STATES OF AMERICA

v.

KEVIN ANTHONY FREEMAN : 1:18CR_ JUSTIN LAMAR BECK : 1:18CR_

TIMOTHY TEAL PEARSON, II : 1:18CR <u>\(\lambda \text{9} \) -3</u>

KYLE EUGENE SANDERS : 1:18CR <u>(09</u>-4

The Grand Jury charges:

COUNT ONE

From in or about 2014, continuing up to and including the present, the exact dates to the Grand Jurors unknown, in the County of Richmond, in the Middle District of North Carolina, and elsewhere, KEVIN ANTHONY FREEMAN, JUSTIN LAMAR BECK, TIMOTHY TEAL PEARSON, II, KYLE EUGENE SANDERS, and divers other persons, known and unknown to the Grand Jurors, knowingly and intentionally did unlawfully conspire, combine, confederate, and agree together and with each other to commit offenses against the laws of the United States, that is:

1. To knowingly, intentionally, and unlawfully distribute quantities of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of

- Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1);
- 2. To knowingly, intentionally, and unlawfully manufacture quantities of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1);
- 3. To knowingly, intentionally, and unlawfully possess pseudoephedrine, a List I chemical as defined in Title 21, United States Code, Section 802, knowing and having reasonable cause to believe that such listed chemical would be used to manufacture methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812, in a manner not authorized by Title 21, United States Code, Chapter 13, Subchapter I, in violation of Title 21, United States Code, Section 841(c)(2); and
- 4. To knowingly, intentionally, and unlawfully possess equipment, chemicals, products, and materials which may be used in the manufacture of methamphetamine, a Schedule II controlled substance, within the meaning of Title 21, United States Code, Section 812, knowing, intending, and having reasonable cause to believe that such equipment, chemicals, products, and

materials will be used to manufacture methamphetamine, in violation of Title 21, United States Code, Section 843(a)(6).

All in violation of Title 21, United States Code, Sections 846, 841(b)(1)(C), 841(c)(2), and 843(d)(2).

COUNT TWO

On or about October 11, 2017, in the County of Richmond, in the Middle District of North Carolina, KEVIN ANTHONY FREEMAN and KYLE EUGENE SANDERS did knowingly, intentionally, and unlawfully possess equipment, chemicals, products, and materials which may be used in the manufacture of methamphetamine, a Schedule II controlled substance, within the meaning of Title 21, United States Code, Section 812, knowing, intending, and having reasonable cause to believe that such equipment, chemicals, products, and materials will be used to manufacture methamphetamine; in violation of Title 21, United States Code, Section 843(a)(6).

COUNT THREE

On or about October 18, 2017, in the County of Richmond, in the Middle District of North Carolina, KEVIN ANTHONY FREEMAN did knowingly, intentionally, and unlawfully possess equipment, chemicals, products, and materials which may be used in the manufacture of

methamphetamine, a Schedule II controlled substance, within the meaning of Title 21, United States Code, Section 812, knowing, intending, and having reasonable cause to believe that such equipment, chemicals, products, and materials will be used to manufacture methamphetamine; in violation of Title 21, United States Code, Section 843(a)(6).

COUNT FOUR

On or about October 18, 2017, in the County of Richmond, in the Middle District of North Carolina, KEVIN ANTHONY FREEMAN, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, drug conspiracy, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), did knowingly possess a firearm, that is, a Taurus .38 caliber handgun; in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FIVE

On or about November 29, 2017, in the County of Richmond, in the Middle District of North Carolina, TIMOTHY TEAL PEARSON, II, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, drug conspiracy, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), did knowingly possess a

short-barreled shotgun, that is, a Mossberg 12 gauge shotgun; in violation of Title 18, United States Code, Section 924(c)(1)(B)(i).

COUNT SIX

On or about January 18, 2018, in the County of Richmond, in the Middle District of North Carolina, KEVIN ANTHONY FREEMAN did knowingly, intentionally, and unlawfully manufacture quantities of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812; in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT SEVEN

On or about January 18, 2018, in the County of Richmond, in the Middle District of North Carolina, KEVIN ANTHONY FREEMAN did knowingly, intentionally, and unlawfully possess equipment, chemicals, products, and materials which may be used in the manufacture of methamphetamine, a Schedule II controlled substance, within the meaning of Title 21, United States Code, Section 812, knowing, intending, and having reasonable cause to believe that such equipment, chemicals, products, and materials will be used to manufacture methamphetamine; in violation of Title 21, United States Code, Section 843(a)(6).

COUNT EIGHT

On or about January 18, 2018, in the County of Richmond, in the Middle District of North Carolina, KEVIN ANTHONY FREEMAN did knowingly and unlawfully lease, rent, use, and maintain a place, that is, a residence located at 106 Aslington Street, Rockingham, North Carolina, permanently and temporarily, for the purpose of manufacturing, distributing, and using a controlled substance, that is, methamphetamine, Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812; in violation of Title 21, United States Code, Section 856(a)(1) and (b).

DATED: February 26, 2018

MATTHEW G.T. MARTIN United States Attorney

BY: CLIFTON T. BARRETT Assistant United States Attorney

A TRUE BILL:

FOREPERSON